



August 7, 2017

FCC Appeal

Attn: FCC Waiver

Docket No: Schools and Libraries Program: CC Docket No. 02-6

Re: Request to update last day to invoice

Funding Year: 2015

FCC Form 471 Application Number: 996376

Funding Request Number: 2832554

Billed Entity Number: 120371

Applicant Name: Billerica Public Schools
365 Boston Road
Billerica, MA 01821

In accordance with Sections 54.719 through 54.721 of the Commission's Rules, Community School District 205, through its consultant E-RATE ONLINE, requests an FCC Waiver of the FY2015 invoicing window deadline.

A one-time invoice deadline extension request was appropriately faxed on October 21, 2016 on behalf of Billerica Public Schools, seven days prior to the funding year 2015 invoicing deadline. See attached supporting documentation "Extension Request". In this request, a ministerial and clerical (M&C) error occurred by the typist when requesting an extension for committed Conversent Communications/EarthLink Business FRN 2832554 was not granted the one-time 120-day extension due to this error.

An FCC appeal was submitted to request an invoice deadline extension on April 11, 2017. On DA No. 17-385, released April 28, 2017 the FCC granted the appeal for Billerica. No additional documentation regarding the granted appeal were provided directly from USAC. On 6/8/2017, an inquiry was submitted via Case # 182282 stating that FRN 2832554 last date to invoice had not yet been updated. USAC response to the inquiry on 6/8/2017 was that USAC has 90-calendar days from the Public Notice to review and make their decision, once complete a notification would be received. An additional inquiry was submitted via Case # 187224 on 7/18/2017 due to the 90-calendar day deadline approaching for a final USAC decision. USAC response to inquiry on 7/18/2017 stated that the last day to invoice was updated to 7/16/2017 but a notification was never received. USAC suggested to complete an appeal for Billerica Public Schools. An appeal was submitted on 7/18/2017, with the explanation that the last day to invoice for FRN 2832554 was approved and updated with a date of 7/16/2017, but since no notification was received the deadline passed unknowingly. On 7/20/2017 USAC responded to the appeal stating the Administrator's Decision on FCC Remand that was sent on May 19, 2017. The first inquiry was submitted on 6/8/2017, 20-calendar days after the notification was sent which never received. If a final USAC decision was made on 5/19/2017, therefore during my initial inquiry on 6/8/2017 USAC should have stated that the decision on FCC remand has been approved instead they stated that the appeal was still under review and once a decision was made a notification would be sent.

This waiver request is to grant an additional deadline extension since USAC did not properly inform the applicant of the approval of the original Administrator's Decision on FCC Remand.

This original invoice deadline extension request was made in good faith. No waste, fraud or abuse has occurred. We request this be reviewed further so the actual issue at hand can be revised.

Regards,

Amanda Miguel



Contact Information: Amanda Miguel
Account Manager
E-RATE ONLINE, LLC
200 Boston Post Road, Ste. 11 Orange, CT 06477
[p] 203-445-9577 [f] 203-445-0456
amiguel@erateportal.com

Attachments: 3

FCC Appeal, April 11, 2017
FCC Approval Public Notice, April 28, 2017
USAC Case # 187224
USAC Case # 182282
USAC Appeal Response